

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION, CINCINNATI**

JOSE MARIA DECASTRO,	:	CASE NO. 1:22-cv-00204
	:	
Plaintiff,	:	Judge Michael R. Barrett
	:	Magistrate Judge Stephanie K. Bowman
v.	:	
	:	DEFENDANTS PAM WAGNER, BRAD
PAM WAGNER, ET AL.,	:	SPOLJARIC, CHANCE BLANKENSHIP,
	:	EVAN MCNIGHT, ROBERT FOUCH,
Defendants.	:	AND THE CITY OF IRLINTON, OHIO’S
	:	MOTION FOR LEAVE TO FILE
	:	EXHIBIT MANUALLY
	:	
	:	

Now come Defendants Pam Wagner, Brad Spoljaric, Chance Blankenship, Evan McNight, Robert Fouch, and the City of Ironton, Ohio (“the Ironton Defendants”), by and through counsel, and hereby move the Court to grant them leave, *via* notation order, to manually file a flash drive containing the full, unredacted audio and video of Plaintiff’s arrest which he recorded. The video and audio recording cannot be filed through the Court’s CM/ECF system, and the recording will help to complete the record in this case and allow the Court to consider it in connection with the Ironton Defendants’ Motion for Judgment on the Pleadings (Doc. 23), Plaintiffs’ Response in Opposition to the Ironton Defendants’ Motion for Judgment on the Pleadings (Doc. 32), and the Ironton Defendants’ Reply in Support of its Motion for Judgment on the Pleadings. The Ironton Defendants reached out to Plaintiff to make sure there was no objection, however, the Ironton Defendants received no response. Attached hereto as Exhibits 1 and 2 are true and accurate copies of the email and send confirmation.

WHEREFORE, the Ironton Defendants respectfully seek an Order allowing them to file

the flash drive manually.

Respectfully submitted,

SURDYK, DOWD & TURNER CO., L.P.A.

/s/ Dawn M. Frick

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Chance Blankenship, Evan McNight, Robert
Fouch, and the City of Ironton, Ohio*

CERTIFICATE OF SERVICE

I hereby certify that on February 9, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, a copy of which will automatically be forwarded to the parties or their counsel of record and I certify that I have mailed by United States Postal Service First Class mail and by electronic mail, the document to the parties not participating in the electronic filing system:

Jose Maria DeCastro
1258 Franklin Street
Santa Monica, CA 90404
iamalaskan@gmail.com

/s/ Dawn M. Frick

Dawn M. Frick (0069068)